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March 1, 2012

**Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington, DC 20554

**Re: Tata Communications Services (America) Inc. - Filer ID: 825226  
CPNI Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Tata Communications Services (America) Inc. ("TCSA"), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Company's 2011 CPNI compliance certification. Please note that Tata Communications Services (America) Inc. was dissolved as of March 30, 2011. The attached certification covers the period from January 1, 2011 through March 30, 2011. **TCSA informs the Commission that this CPNI Compliance Certification will be the last one filed for TCSA.**

Please direct any questions regarding this submission to the undersigned.

Very truly yours,

*/s/ Ronald W. Del Sesto, Jr.*

Ronald W. Del Sesto, Jr.

Enclosure

cc: Best Copy and Printing, Inc. (via E-Mail)

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**Tata Communications Services (America) Inc.**  
**Annual 47 C.F.R. 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year (2011)

Date filed: March 1, 2012

Name of company covered by this certification: Tata Communications Services (America) Inc.

Form 499 Filer ID: 825226

Name of Signatory: David Ryan

Title of signatory: Executive Vice President

I, David Ryan, certify that I am an officer of the company named above ("TCSA"), and acting as an agent of TCSA, that I have personal knowledge that TCSA has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how TCSA's procedures ensure that TCSA is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

TCSA has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at state commissions, the court system, or at the Commission) against data brokers in the past year.

TCSA has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

TCSA represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. TCSA also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  David Ryan, Executive Vice President  
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**Attachment:** Accompanying Statement explaining CPNI procedures

**Tata Communications Services (America) Inc.**  
**Annual 47 C.F.R. 64.2009(e) CPNI Certification**

**EB Docket 06-36**

**Accompanying Statement**

Tata Communications Services (America) Inc. ("TCSA") is committed to protecting the privacy of its customers. To accomplish this, TCSA has implemented a comprehensive Privacy Policy that governs all information collected by or submitted to TCSA. TCSA's customer contracts contain confidentiality requirements regarding the treatment of customer information, including CPNI, and TCSA employees are prohibited from disclosing such information. TCSA has entered into a National Security Agreement with the Department of Justice, including the Federal Bureau of Investigation, the Department of Homeland Security and the Department of Defense, that includes a provision requiring TCSA to comply with the FCC's CPNI rules.

TCSA serves wholesale carriers and large enterprise customers and does not actively market its services. TCSA never uses CPNI in outbound marketing campaigns and therefore does not collect opt-in authorizations from customers for such use. When customers have come to TCSA shopping for the best price, TCSA would first sign a nondisclosure agreement with the prospective customer and then market to them using TCSA's price list for telecommunications services. When TCSA has contacted potential customers (*i.e.*, customers that did not contact TCSA first), TCSA identified them through public sources such as industry magazines or trade shows. The only instance in which TCSA may initiate contact with the customer using CPNI is for billing, maintenance and repair purposes, and to inquire about the customer's satisfaction with its existing services.

Furthermore, TCSA does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors or any other third parties for the purposes of marketing any services. The provision of CPNI to any unrelated third parties is strictly prohibited except for billing purposes, for the provision, maintenance and repair of services, to protect rights or property of TCSA, or pursuant to legal process.

Importantly, TCSA personnel are not permitted to disclose any confidential customer information, including CPNI. All TCSA personnel have certified in writing that they have read and will adhere to the Code of Conduct ("Code"), which contains strict confidentiality requirements for all customer confidential information, including CPNI, and provides for disciplinary action for violation up to, and including, immediate termination of employment. In fact, as part of an overall program of legal compliance training for TCSA employees, TCSA has instituted a web-based training program that trains employees on a variety of legal compliance matters, including training relating to the Code. Additionally, at the time of hiring, all new personnel must sign an agreement on Confidential Information, Intellectual Property and Exclusivity Undertakings, which includes confidentiality requirements such as maintaining the confidentiality of customer information. TCSA personnel who are authorized to access CPNI are trained in the authorized uses of this information.

TCSA is prepared to comply with applicable breach notification laws in the event of a CPNI breach.